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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 ELISEO NAPOLES, MARIA NAPOLES
13 AND M.N., A MINOR, BY AND
THROUGH HIS GUARDIAN AD LITEM,

14 Plaintiffs,

15 v.

16 CLARK COUNTY SCHOOL DISTRICT,
17 DOES I through X, inclusive; ROE
18 CORPORATIONS I through X, inclusive,

19 Defendant.

CASE NO.: 2:19-cv-01474-APG-BNW

**STIPULATION AND ORDER ALLOWING
CERTAIN DEPOSITIONS TO TAKE
PLACE AFTER DISCOVERY DEADLINE
AND EXTENDING DEADLINE FOR
DISPOSITIVE MOTIONS AND JOINT
PRE-TRIAL ORDER**

(First Request)

20 Plaintiffs Eliseo Napoles, Maria Napoles, and M.N., by and through his guardian ad litem,
21 (hereinafter, "Plaintiffs"), and Defendant Clark County School District (hereinafter,
22 "Defendant"), by and through their respective attorneys of record, agree as set forth below to take
23 two depositions after the close of discovery on May 17, 2021, to extend the deadline for
24 dispositive motions from June 16, 2021 to July 30, 2021, and to extend the deadline for pre-trial
25 orders from July 16, 2021 to August 30, 2021. This is the Parties' first request for an extension of
26 time of the dispositive motions and joint pre-trial order.

27 WHEREAS the current discovery deadline is Monday, May 17, 2021;
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1 WHEREAS the current deadlines to file dispositive motions and the joint pre-trial order
2 are June 26, 2021 and July 16, 2021, respectively;

3 WHEREAS two depositions noticed by Plaintiffs (Sara Rosengren and a Rule 30(b)(6) of
4 Defendant) have not taken place due to scheduling issues and a meet and confer;

5 WHEREAS the parties agreed to reschedule the two depositions for a subsequent date to
6 occur after the May 17, 2021 discovery cut-off;

7 WHEREAS the parties have agreed to reschedule Sara Rosengren's deposition for
8 Monday, May 24, 2021, considering the schedule of Ms. Rosengren and counsel for the Parties;

9 WHEREAS the parties have agreed to reschedule the Rule 30(b)(6) of Defendant
10 deposition for Thursday, May 27, 2021 and Wednesday, June 2, 2021, considering the schedules
11 of parties and counsel for the Parties;

12 WHEREAS, the dates of the two continued depositions, will require an extension of the
13 dispositive motion deadline to ensure complete copies of two deposition transcripts are available
14 and received; therefore the Parties request that the dispositive motion deadline be continued for
15 forty-five days (45) or until July 30, 2021. In conjunction with this, the Parties request that the
16 deadline for the pre-trial order be continued for thirty days (30) after that, or until August 30,
17 2021. This is the Parties' first request for an extension of these deadlines, and is requested due to
18 the circumstances detailed above, and the Parties' schedules. It is made in good faith and is not
19 intended to cause delay.

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1 IT IS HEREBY STIPULATED AS FOLLOWS:

2 1. The depositions of Sara Rosengren and the Rule 30(b)(6) of Defendant are permitted to
3 proceed after the close of the discovery deadline, May 17, 2021.

4 2. The deadlines to file dispositive motions and the joint pre-trial order are continued for
5 forty-five days, until July 30, 2021 and August 30, 2021, respectively.

6 Dated: May 20, 2021.

Dated: May 20, 2021.

7 HATFIELD & ASSOCIATES, LTD.

CLARK COUNTY SCHOOL DISTRICT
OFFICE OF THE GENERAL COUNSEL

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14 **ORDER**

15 **IT IS SO ORDERED.**

16 Dated May 24, 2021.

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19 UNITED STATES MAGISTRATE JUDGE